



Office of Immigration and Multiculturalism  
Immigration, Population Growth and Skills  
Email: pnp@gov.nl.ca, immigration@gov.nl.ca

February 2, 2024

**Re: Recommend replacing the name of ICCRC with CICC in the NLPNP Use of Representative Form and guides to reflect the legislative change and revising the wording in the guides to reflect the letter and spirit of IRPA**

Dear Sir/Madam,

The Canadian Association of Professional Immigration Consultants (CAPIC) is the sole association recognized by the Government of Canada as the [voice](#) of RCICs and is committed to promoting the ethics and competence of our members and protecting the [integrity](#) of the RCIC profession and the Canadian immigration system.

CAPIC would like to bring to your attention the following two matters:

1. The use of the outdated name of the former designated organization, the Immigration Consultants of Canada Regulatory Council (ICCRC)

It is in the [NLPNP Use of Representative Form](#) (see Section B, item 2) and some guides (see Use of a Representative Section of the two guides mentioned below).

On December 9, 2020, with the [coming into force](#) of the [College of Immigration and Citizenship Consultants Act](#), S.C. 2019, c. 29, s. 292 (the College Act), the College of Immigration and Citizenship Consultants (CICC), the regulatory body for RCICs established by the College Act, replaced the ICCRC.

2. The wording used in your guides concerning the use of representatives

On p.5 of the [International Graduate Entrepreneur Category Application Guide](#) and the [International Entrepreneur Category Application Guide](#), it reads, "Warning: Payment to an individual who is not regulated as above [APs] offers no legal opportunity for complaint and is strongly discouraged by the OIM." While CAPIC understands it is to show the disapproval of the NLPNP for the use of unauthorized paid representatives and appreciates the good intentions of the NLPNP, the expression "is strongly discouraged by the OIM" could be confusing.



Canadian Association of  
Professional Immigration Consultants  
L'Association Canadienne des  
Conseillers Professionnels en Immigration

Pursuant to [s. 91\(9\)](#) of the *Immigration and Refugee Protection Act*, S.C. 2001, c. 27 (IRPA), obtaining considerations in exchange for immigration advice/services without being authorized is **an offence** subject to a fine and/or imprisonment. Therefore, CAPIC recommends explicitly stating that such a practice is an offence, which reflects the provision of IRPA more accurately and should also be more effective in preventing immigration fraud.

CAPIC is willing and able to assist in immigration legislation, regulation, and policy development as well as program improvements. If we may further assist with the NLPNP, we will be glad to work with you and your team.

Yours Truly,

A handwritten signature in black ink, appearing to read 'Dory Jade'.

Dory Jade, C. Dir.  
Chief Executive Officer  
CAPIC-ACCPI

c John Murray  
President & CEO, Registrar, CICC